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AUTHOR	Lewis, Linda M.
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ABSTRACT

The document reports the Washington component of Project IEP (individualized education program), a project designed to identify and clarify perceptions related to roles in the IEP process as mandated by P.L. 94-142, the Education for All Handicapped Children Act. It is explained that under Project IEP approximately 200 persons (including state and local education administrators, regular and special teachers, parents of handicapped children and the children themselves, support personnel, and advocacy groups) were given open-ended interviews. Findings and suggestions are reported for the following areas: parental roles (reasons for, barriers to, and consequences of parental involvement); role of teachers and support personnel (increased demands, effects on morale, accountability, and effects on programs for children); and federal/state/local relationships (monitoring, standards, and fiscal needs for implementation). Listed among IEP Panel recommendations are that there is a need for educators to recognize that their specialized vocabulary may not be functional in communicating with noneducators; that additional resources necessary to meet the mandate of the law will be required; and that to assure optimum development of a child's program that includes future needs, a protective clause should be provided to prevent litigation against the local educational agency if services are not provided as projected. (SBH)

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Project IEP

Washington State Report

Project IEP was a joint effort of the Bureau of Education for the Handicapped, U.S. Office of Education and Nero and Associates, Inc., in cooperation with the Special Services Section, Office of the Superintendent of Public Instruction, Washington.

PROJECT IEP: WASHINGTON STATE REPORT

Prepared by
Linda M. Lewis
Nero & Associates, Inc.

Project IEP Principal Investigators
Patricia A. Morrissey · Nancy D. Safer
Bureau of Education for the Handicapped
U.S. Office of Education

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PROJECT IEP INVESTIGATORY TEAM

Case Analysts

Janet Whitney
Patricia Wilkins

Interviewers

Gabrielle Doverglas
John Dziedzic
Sandy Ellis
Crystal Keowan
Kay McCorkell
Terry Patton
Sally Puff
Peter Valuckas

PROJECT IEP: SCHOOL DISTRICTS AND DIRECTORS OF SPECIAL SERVICES

Harry Carthum
Aberdeen School District

Hank Langeman
Ephrata School District

Ed Dodson
Inchelium School District

Katerie Brow
Issaquah School District

Fred Row
Selah School District

Larry O'Hare
Spokane School District

Ralph Baird
Tacoma School District

PREFACE

In November, 1975, the U.S. Congress passed Public Law 94-142, the Education for All Handicapped Children Act. The central focus of this legislation is the right of each handicapped child to a free, appropriate public education. A key mechanism for assuring such an education is the provision of an individualized education program, or IEP. The IEP is to contain the following components:

- a statement of the child's current level of performance
- a statement of annual goals and short-term objectives
- a statement of intended services
- a statement of extent of participation in regular education
- a statement of dates of initiation and termination of services
- a statement of method, criteria, and schedule for evaluation of child's progress based on the prescribed goals and objectives

The IEP is to be developed in a meeting attended by a local school administrator, the child's teacher, the child's parents, and, when appropriate, the child.

The Bureau of Education for the Handicapped of the U.S. Office of Education is the federal administrative unit charged with facilitating the implementation of this law. It became apparent to Bureau staff members that different people across the nation who were responsible for or affected by the IEP requirement had varied perceptions of the federal mandate and their roles in the IEP process. These perceptions are important because the way people perceive their roles and the roles of others can

be expected to determine how they will implement the process and how they will communicate with others. Clarification of different perspectives was considered an important step in identifying potential barriers to implementation of the law and exploring strategies to facilitate successful implementation.

To identify and clarify perceptions related to roles in the IEP process, the Bureau of Education for the Handicapped sponsored Project IEP. The methods used in this project were specifically designed to solicit the insights and perspectives of those most directly affected by the IEP process. Four states, Alabama, New Jersey, Washington, and Wisconsin, participated in Project IEP from February to May, 1977. In each state, approximately 200 persons were interviewed using open-ended interviews conducted in respondents' homes, offices, or classrooms. Those interviewed included state and local education administrators, regular and special teachers, parents of handicapped children and the children themselves, support personnel, advocacy groups, union representatives, and others.

In May, a clarification forum was held in each state. Of the 150-200 people interviewed in each state, individuals representing diverse experiences and opinions were invited to offer their comments regarding implementation of the IEP at their respective forums. Thus, the forum provided an opportunity for these groups and individuals to share their experiences and clarify their concerns regarding implementation of IEPs within the state.

Twelve individuals whose backgrounds were similar to those of the respondents served on a panel that listened to the information presented and made recommendations about priorities and suggestions for implementing IEP requirements. These recommendations were shared with state education agency personnel and are included at the end of this report.

Comments offered at the four state clarification forums dealt with anticipated changes in the roles and relationships of individuals and organizations. Particular attention was given to anticipated new responsibilities and their potential impact on existing responsibilities as individuals and organizations begin to respond to the IEP mandate.

The report which follows presents information synthesized from the interviews and clarification forum held in the State of Washington. Although it was felt that the use of an open-ended, less structured interview technique would produce more in-depth, accurate information, this technique also makes the reporting of findings in terms of percentage of respondents virtually impossible. Thus, in the pages that follow, statements referring to "many" or "most" teachers, parents, and others may be interpreted as referring to a majority of respondents in the designated group unless otherwise indicated. Some comments of particular individuals are also included to exemplify or further explore certain points mentioned often during the study. The information presented in this report may be viewed as transient, since perceptions may be expected to change with time and experience. However, the data was collected just prior to the mandated date of IEP implementation, October 1, 1977. Thus, the report should be viewed as a documentation of initial perspectives and suggestions. In the future it may serve as a reference point against which to measure changes in perceptions and changes in our efforts to provide individualized education for handicapped children.

WASHINGTON STATE REPORT

Practice Prior to Implementation of PL 94-142

In 1971, Washington enacted House Bill 90, the state mandate designed to provide appropriate education at public expense to all children with handicapping conditions. Implemented in 1973, HB 90 preceded PL 94-142 and closely parallels its provisions for individualized educational programming. There are, however, two differences between the laws which should be noted.

PL 94-142 specifies that the individualized educational program (IEP) for the handicapped child was to be developed at a meeting attended by school personnel and the parent. Under state law, school personnel developed the child's program up to the point of determining short-term instructional objectives. The program was required to be developed prior to the child's placement for special education services and was typically developed by support personnel, usually psychologists, communication disorder specialists, or educational specialists working individually. Parental approval was required before a child could be tested and again after the placement option was recommended and long-range goals developed. Parental involvement in determining goals was encouraged. However, in contrast to the requirements of PL 94-142, the short-term instructional objectives were developed by the child's special education teacher after placement with parental review usually occurring some time later.

Thus, while the IEP process of PL 94-142 implies a group process and a shared home/school responsibility for program planning, Washington state law suggested a linear, school-based process in which responsibility for each step of the process was assigned to particular individuals. Some districts in Washington employed the group or team process, but

for others it was new and brought with it potential changes in roles, responsibilities, and procedures.

Another difference between the laws is related to the educational program plan itself and is more a difference in degree than in kind. PL 94-142 specifies the content of the IEP (see Preface). Although similar requirements are found in the state law, many people have interpreted the new federal provisions as requiring information which is both broader in scope and, in some cases, more detailed. The initial regulations of PL 94-142 did specify a more detailed educational program plan than do state regulations, particularly in the area of a child's current level of functioning, but those regulations have been revised, making the two laws nearly identical. Concerns of school personnel about the initial regulations are of interest, however, because initial perceptions of PL 94-142 may persist and affect the attitude with which people approach implementation.

Almost without exception, Washington respondents to Project IEP examined the IEP component of PL 94-142 in light of their own experience in defining roles, responsibilities, and policies to meet the provisions of their state law. For the most part, the IEP component of PL 94-142 was viewed by a majority of respondents from two perspectives: Some persons felt that the federal law represented an endorsement of the individualized educational programming initiatives taken in the state since the enactment of HB 90. Further, they saw the eventual contribution of substantial federal funding as providing resources needed to finance improvements in special education services. Others, however, felt that PL 94-142 would merely replace a functioning process for program planning for children with a set of new procedures designed to accomplish the same end.

The respondents' points of view will be presented in greater detail in the body of this report. This information was gathered from November, 1976, to May, 1977, in interviews with over 100 people in state agencies, advocacy groups, the legislature, colleges, teacher organizations, institutions, and seven local school districts (Aberdeen, Ephrata, Inchelium, Issaquah, Selah, Spokane, and Tacoma). Thirty of these individuals spoke on the impact of the IEP process at the Washington Clarification Forum held in Seattle on May 4, 5, and 6, 1977.

The report is divided into three sections: (a) perceptions of parent roles; (b) perceptions of instructional and support personnel roles; and (c) perceptions of federal, state, and local relationships. Each of these sections includes a description of practice prior to implementation, capsule statement of the principal reactions to the IEP component, a perspective section amplifying the capsule statement, and a summary section which includes best practice recommendations. At the end of this report is a summary of recommendations made by the Clarification Forum Panel.

The Parental Role

Although parents have had a formalized role in educational program planning for several years as a result of HB 90, the federal law expands that role. It does this by specifying that parents must participate in the pupil planning meeting at which the IEP document is developed with the child's teacher and a representative of the local school district in educational program planning. Currently, state regulations specify that parents must give their consent before their children can be tested, and if the child is determined eligible for special education services,

must sign statements which describe the placement decisions, the long-range goals developed by assessment personnel, and the short-term objectives developed by the special education teacher after placement. Beyond mandated requirements, parental involvement in the education of the child has varied as a consequence of both school and parental interest and initiative.

Many project respondents, including some parents, view the expanded parental role resulting from PL 94-142 to mean that parents will now share responsibility with school personnel for developing their child's educational program. In addition, the law's provision that the school district must assure participation is interpreted by many to mean that districts are responsible for involving all, or at least more, parents in the pupil planning process. Although there is overwhelming agreement among parents and educators in the state of Washington that parental participation is desirable, both groups expressed a great deal of concern about the nature and extent of parental involvement, the difficulties associated with it, and the extent of responsibility of the district for assuring it.

Reactions to the IEP Requirements of PL 94-142

Reasons for Active Parental Participation

Participants agree there are several significant reasons for active parental participation in educational program planning.

- Parents contribute unique information about the development, handicapping condition, and programming history of the child which helps school personnel focus on the child's total development rather than on academic functioning alone.
- It is unlikely that one person in the school will have continuous responsibility for the child; thus, the parents can provide continuity to the planning effort that is otherwise unavailable.
- Parents who are involved in the education program are believed more able to reinforce educational concepts in the home, potentially strengthening their impact on the child.

- Parents who have an active role in educational planning are believed to be more committed to and supportive of both the special education program and the school personnel who implement it.

Barriers to Parental Participation

- Most parents and educators agreed in their belief that parents do not have the skills required to specify goals, objectives, and instructional methods and that educational program planning is best done by professional educators.
- Parents are often intimidated by certain aspects of the pupil planning process. They feel that they lack the knowledge and confidence to effectively question committee recommendations and feel that they are especially hampered when the committee members already have a firm commitment to a particular program before they meet with the parents.
- Educators are prone to rely on educational jargon and test data which are not understood by parents.
- Circumstances such as distance from the school building, work schedules, cost of participation, and personal priorities sometimes interfere with parental participation.
- Some parents are disinterested in their child's education or do not accept the child's handicapping condition.

Consequences of Parental Involvement

- There may be a delay in providing services or in modifying programs while formal notification and consent procedures are being implemented.
- School personnel may have to provide fewer direct services than they now provide because of the additional time they must spend in obtaining consent from parents.
- Scheduling meetings for working parents may mean that teachers and the participating LEA representative will have to attend conferences after school or in the evening.

Reasons for Active Parental Involvement

Many parents and educators assert that parental participation in the IEP committee meeting implies that they share the responsibility for specifying the goals, objectives, and instructional methods to be used in their

child's educational program. Both groups essentially agree that parents, with their unique and continuous perspective, have valuable information to contribute to the development of the child's program and should have an active role in the continuous review of the IEP. In requiring that there be a formal meeting between parents and educators, PL 94-142 creates a forum for communication about the child. Although few respondents believed that the federal requirements would increase the number of parents involved in the educational program of their child, most did feel that the meeting would at least provide a positive setting and that the discussions around the IEP document would be a useful focus for sharing important information between the home and school.

Despite their endorsement of systematic parental participation, some support personnel raised one issue of concern about involving parents in the early stage of educational program development. Because multiple factors enter into the placement and program decisions made for any child, support personnel questioned the appropriateness of discussing possible programming alternatives at the IEP committee meeting. They felt that matching a child with a particular teacher and program often means discussing the child's handicapping condition in terms that may be unfamiliar to parents, and sometimes involves taking into consideration the impact that teacher style and personality might have on the child's success in the classroom. Support personnel said that they do not want to engage in professional discussions or, perhaps, disagreements in the presence of the parent to whom they felt it was important to present a unified opinion.

Barriers to Parental Participation

Respondents' concerns over factors which have inhibited active parental involvement under HB 90 suggest that school personnel need to be particularly sensitive to facilitating the parental role in the IEP process. As the only members of the program planning process who are not professional educators, parents often feel that their lack of knowledge about special education practices and jargon, the handicapping condition of their child, and the administrative procedures employed by the school district hampers their ability to contribute to the meeting and also affects their self-concepts as respected participants in the process. Many parents said they want to be perceived as valued members of the IEP committee who have input to be considered in the development of the educational plan rather than as participants who serve merely to approve school decisions.

Some school personnel reported that it is often difficult for interested parents to participate in program planning for their children. Working parents and parents with young children in the home often cannot attend meetings during the school day without taking leave from work or hiring babysitters. Parents who live far from the school, most often in rural and highly urbanized areas, sometimes lack the transportation necessary to travel to meetings. Particularly in rural areas, parents who are involved in seasonal or farm work are not always able to conveniently meet with school personnel at the time their child's program is planned.

Citing experiences with a minority of parents, many teachers and support personnel pointed out that, despite a school's encouragement, some parents do not participate in their child's formal education. In some cases, parents either express little interest in their child's

program or feel that program planning is a school rather than parental responsibility. A few others, they said, do not accept that their child has a handicapping condition or may feel some guilt over the child's needs and, therefore, do not become actively involved in special education planning.

In order to maximize the involvement of parents in the pupil planning process, school personnel need to be sensitive to the various ways in which parents can contribute to the development of the program plan and need to be supportive of parental participation. Further, local districts must pay particular attention to ways in which they can eliminate circumstances parents consider inhibiting or intimidating, such as the use of educational jargon and the selection of a program by school personnel prior to the IEP meeting.

Consequences of Parental Involvement

Although they believe that notification and consent procedures are critical procedural safeguards, some local administrators and other school personnel are concerned that the school's responsibility for assuring parent participation will become a fiscal burden, particularly in cases where parental consent is difficult to obtain. Many school personnel and teachers pointed out that those parents who are interested in their child's education are already involved and that no mandate or formalized process will change the attitude of parents who choose not to participate. Experience with obtaining parental consent since implementation of the state law suggests that in order to fulfill IEP requirements, school districts will have to assume the responsibility for committing increased

resources, both financial and personnel, to involve the parents of institutionalized children and parents who, for lack of interest or because of personal circumstances, typically do not become involved with the educational program of their child. Some teachers and support personnel said that if they are responsible for obtaining parental consent they will have to take service time from children in order to make and document contact with parents and may have to make home visits in the evening. In addition, some school personnel questioned the fairness of arranging IEP meetings at the convenience of parents without consideration for the convenience of other meeting participants. School personnel predicted that there will be delays in service to children whose parents have not given their consent and that for some children such delays could be critical.

Summary and Suggestions

The role of parents in the pupil planning process has been expanded by PL 94-142 to include them as members of the committee which develops the IEP. There is agreement that active parental involvement is critical both to the quality of the program developed and to the effectiveness of implementation of the program. If active parental participation in the IEP process is to be realized, attention should be focused on modifiable factors that are considered limiting to parental involvement. The language used by school personnel to communicate with parents verbally and in writing should be clear and meaningful rather than dependent upon a jargon familiar to professional educators. The attitudes of school personnel toward the importance of parental contributions to planning clearly must be positive and supportive, and interactions with parents must reflect that attitude.

Although most parents want specific program components such as objectives, materials, and teaching methods determined by school personnel, care must be taken to include parents in the discussion of program alternatives and to fully describe appropriate options to them.

Several project respondents recommended two strategies that address some parents' concerns that they lack familiarity with the pupil planning process and special education practice and knowledge about the handicapping conditions of their child. First, it was suggested that state and local educational agencies and advocacy groups together explore ways that parents can be trained to participate in the IEP process. Parents could be familiarized with local programming options and procedures, the needs and abilities of their handicapped child, and parental rights and responsibilities. A second strategy is to provide parents with access to trained advocates who could either accompany them to IEP meetings or answer their questions about various aspects of the pupil planning process.

To minimize the costs to the district and at the same time assure that the quality of the educational plan and services to the child are not adversely affected, project respondents offered several suggestions. Rather than delay services or program changes while parental consent is being sought, particularly in the case of the institutionalized child, schools could utilize a committee of parents to review and approve program plans when parental involvement has not occurred.*/ The Forum Panel recommended that a district should be considered in compliance if it documents its efforts to involve parents. In order to assure that service is not

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*/ This recommendation has not been reviewed for compliance with PL 94-142.

adversely affected by procedural safeguard requirements, standards should be flexible enough to allow for responsible LEA procedures responsive to local conditions, individual parent situations, and the service needs of children.

The Role of Teachers and Support Personnel

Teachers and support personnel (i.e., psychologists, social workers) expressed overwhelming support of the concept underlying the IEP component of PL 94-142 and viewed it as further reinforcement to their state mandate in the area of individual pupil planning and programming. Despite this enthusiasm, many expressed concern over expected changes in their responsibilities and the effect that implementation will have on the services provided to children.

Under HB 90, support personnel were responsible for assessing children's current levels of functioning, developing long-range goals, determining placement alternatives (often in consultation with the local director of special education and special education teacher), and discussing these program options with parents. In addition, they were often responsible for managing the overall monitoring and evaluation of the child's program and were sometimes involved in consultations with parents and teachers, implementation of instruction in the classroom, and therapy with children.

The special education teacher was responsible under state law for determining the short-term instructional objectives of the handicapped child once the child had been placed for instruction. These objectives were written from the long-range goals and were typically developed

after the teacher had worked with the child and had administered informal tests if required. Formal contact with parents to discuss the objectives was usually made within the first months of the school year, although informal contact often occured on an ongoing basis. State regulations did not require the regular education teacher who worked with the handicapped children to participate in the planning of the child's educational program. In some districts, informal involvement did occur, most often on a one-to-one basis between the resource teacher or diagnostician and the regular education teacher.

PL 94-142 specifies that the educational program plan for a child with a handicapping condition will be developed in a meeting attended by the child's teacher, a representative of the school district, the child's parent(s) and, when appropriate, the child. This provision of the law suggests to many that a group process must be employed in pupil planning. Although a particular role for support personnel is not specified, current practice suggests they will be members of the IEP meeting because of their responsibility for the development of long-range goals. Many support personnel anticipate that as a result of implementation of the IEP process, they will need to spend an increased amount of time in activities other than assessment or related service activities in order to fulfill procedural requirements. Many special education teachers and some teachers in regular education anticipate that they now will be involved in more extensive program planning and will share the responsibility for determining short-term objectives with the other participants of the meeting. In addition, they anticipate that some noninstructional responsibilities will be added, and that these new responsibilities will take time away from the direct instruction of children.

Reactions to the IEP Requirements of PL 94-142

Increased Demands

- Special education teachers anticipate new responsibilities in comprehensive program planning and classroom management.
- Regular education teachers anticipate increased responsibilities in planning for and instructing handicapped children.
- Support personnel expect new responsibilities in writing IEPs and increased record keeping.
- More teacher and support personnel time will be needed to participate in activities not directly related to instruction.
- Many teachers feel they do not have the skills required to participate in IEP planning and, in some cases, to implement individualized instruction.

Effects on Morale

Teachers and support personnel predict their attitudes will be adversely affected by:

- increase in teacher accountability for pupil progress,
- loss of authority in program planning,
- emphasis on planning at a cost to other educational services, and
- need to devote personal time to carry out job responsibilities.

Accountability

- Teachers feel that short-term instructional objectives are best determined after they have worked with the child rather than at an IEP meeting held prior to placement; therefore, they do not feel they should be held accountable for predetermined objectives.
- Teachers feel that external monitoring of the IEP document will result in program plans being written in such a way that neither truly reflects child need nor is useful to teachers for instruction.

Effects on Programs for Children

- The quality and extent of services teachers and support personnel currently provide children will be reduced because of the time pressure.
- Resources currently expended on instruction and support services will need to be diverted in order to operationalize the procedural requirements of the IEP process.

Increased Demands

Teachers and support personnel reported that the implementation of HB 90 not only resulted in new responsibilities, but also in a need to devote more time and effort to fulfilling procedural requirements for individual program planning, documentation, and record keeping. They said that although program planning has improved and teachers have better information about the children they work with as a result of the initiatives of HB 90, corresponding improvements in services to children have often not occurred because teachers and support personnel have had to divert time from instructional activities and because resources have been inadequate to fund all the services, materials, personnel, and in-service teacher training necessary to implement individualized instruction. Teachers and support personnel expressed concern that while PL 94-142 will undoubtedly contribute to improvements in program planning in many districts, it will also increase problems of time and resources and, therefore, will not substantially improve services to children with handicapping conditions.

Responsibilities. Many teachers and support personnel interpreted the provisions of PL 94-142 to mean that, in addition to their current responsibilities, they will now have increased responsibilities in educational programming, many of which they consider only indirectly related to the provision of services to children. Although support personnel spoke of their increased responsibility mostly in terms of anticipated demands to do more of what they currently do, teachers identified new tasks they would now have to assume.

Special education teachers consider their participation in the IEP committee meetings to mean that they will share the responsibility

for determining program placement and long-range goals with psychologists and communication specialists. In addition, because teachers usually maintain the closest contact with the parents and other school personnel, they expect the responsibility for coordination of the pupil planning process and parental notification to fall to them. Further, many believe they will have the task of documenting the IEP process and will have to keep more detailed records in order to monitor and evaluate pupil progress toward stated goals and objectives which they expect will become more numerous and more specific. Although many special education teachers already perform informal educational assessments in order to develop instructional objectives, others view this as an additional new responsibility. Some of these teachers said they selected their careers so they could instruct children, not so they could arrange meetings, contact parents and perform what they consider primarily clerical tasks.

Despite the fact that neither HB 90 nor PL 94-142 specify regular education teacher involvement in educational planning, most respondents felt that it was imperative that any teacher serving a handicapped child should have a role in the IEP process. Many regular education teachers expressed concern that their participation in program planning would result in added responsibilities. They anticipated that they would be involved in developing goals and objectives, as well as carrying out special instruction of handicapped children within the regular class. Many teachers both in special and regular education view these responsibilities as "add-ons" to their current jobs and consider them inappropriate for their respective roles as instructional personnel.

Time. Support and teaching personnel alike expressed concern that the IEP process would place increased demands upon their already limited

time. Since the implementation of HB 90, most special education teachers said they have spent an increased amount of time fulfilling procedural and record-keeping requirements; they predict that even more time will be required to respond to provisions of PL 94-142. Besides having to spend more time at planning meetings, both special and regular education teachers foresee having to keep more detailed records on each child's daily progress toward stated goals and objectives and expect that this time will have to be taken away from their daily lesson planning and classroom preparation. In some cases, special education teachers said that they have already had to reduce direct contact with children in order to individualize instruction and record individual pupil progress.

Like the special and regular education teachers, support personnel are concerned about the time that will be needed to carry out their anticipated responsibilities in the IEP process. Many assessment personnel anticipated that they will participate in IEP meetings because of their current responsibilities for developing long-range goals. For some, this would mean attending numerous meetings for children they have assessed or will provide service to. For assessment personnel serving several districts, participation in IEP meetings would present problems of both time and logistics. A communication disorder specialist serving a cooperative of several districts reported that if she participates in the IEP meetings for each of the 60 children she works with at the beginning of the school year, she will not be able to provide instructional services for at least the first two months of school. A psychologist added that there will be so much work to do for children already in the program that little time will remain to assess those newly referred. In addition

to the time spent in IEP meetings, assessment personnel and specialists felt they would have major responsibility for writing the IEP since they have been trained to develop goals and objectives for individualizing instruction.

Many support personnel felt that data collected from assessments and program monitoring was critical both for program development and instruction, but felt that state requirements for the reporting of this information often duplicates local requirements for record keeping. Although they claimed that program planning has improved, many reported that along with this improvement they have seen their direct contact time with children decrease and expressed concern that new responsibilities associated with the IEP process will contribute to a further erosion of service time. Concern was expressed that with the implementation of PL 94-142 might come additional reporting requirements which would further affect their service time. Psychologists in one district said they currently spend fully one half of their time documenting the service they provide with the remaining 50% and, more importantly, not only has contact time with children declined since the implementation of HB 90, but the quality of service they have been able to provide has not noticeably improved.

Skills. Among special and regular education teachers, many stated that they feel they do not have the skills to effectively carry out some of their anticipated responsibilities in the IEP process. Some special education teachers indicated that, although objectives have been employed as the focus of instruction for the last several years (primarily as a result of HB 90), they still do not feel adequately skilled to determine a child's level of functioning, select or develop appropriate goals and

objectives, predict pupil progress, manage individualized classroom instruction, or accurately measure pupil progress. Many of these teachers feel that PL 94-142 implies that they should be able to accomplish these tasks and they are concerned about how these skills will be acquired. Special education teachers further identified the need to improve their skills related to the group pupil planning process. Although they have always talked to parents and other educators, some teachers said that a formal meeting for the purpose of building a program plan would require certain communication skills they feel they do not have.

As noted earlier, the regular education teachers anticipate having some responsibility in the area of individualized planning for handicapped children. Many stated that they lack the skills associated with designing child-centered programs. Further, some felt that participation in a meeting potentially staffed by several special educators might be intimidating because of their own lack of experience and skills in special education. Many regular education teachers said they would not be able to effectively teach the special education child without knowing more about the needs of children with handicapping conditions and without a reduction in class size and the provision of teacher aide assistance to compensate for the additional time they anticipate will be required.

Effects on Morale

Special education teachers often spoke of the critical part their attitude plays in the way they approach their teaching and their interactions with children, and said that the morale of some teachers would be adversely affected by certain provisions of PL 94-142. They said that they felt the law implies a level of accountability of the special

education teacher for pupil progress not required of teachers in regular education and that its provision for group decision making implies a lack of faith in their ability to educate handicapped children. In addition, teachers expressed resentment over the attention and resources that are being placed on planning instead of on providing materials, in-service training, and additional staff, which they feel are necessary for the improvement of individualized classroom instruction. Although many teachers said they would take a wait-and-see attitude on how provisions of PL 94-142 would actually be implemented, several admitted that their interest in remaining committed to their chosen profession was diminishing as they looked at their roles, responsibilities, and amount of support changing.

Special education teachers and support personnel alike reported that accomplishing the various tasks of their jobs not only reduces the time they have for activities directly related to instruction but also requires them to spend personal time and, in some cases, other personal resources. Under PL 94-142, they expect to spend even more personal time attending IEP meetings after school or in the evening, contacting parents, and keeping detailed records. They resent the implication that they are not dedicated professionals if they are not willing to devote their own time to do their job. Like the special education teacher mentioned earlier, support personnel, seeing the nature of their jobs changing, the quality of their work diminish, and their personal time often being used, claim they seriously consider exploring professional options outside the public school setting.

Accountability

Teacher experience in writing short-term instructional objectives which are both appropriate for the child and helpful to the teacher in

guiding instructional interventions indicates to them that they must be developed after the teacher has had some experience with the child rather than prior to the child's placement. Several teachers stated that observing a child's behavior and levels of functioning in the classroom setting for a time helps them know what objectives are most appropriate for instruction. Although potential short-term objectives should be discussed at the IEP meeting, experience suggests to teachers that final decisions about objectives should be made by the teacher after the child has been placed and then discussed with the child's parents. Teachers feel that if this method were in use, they would not be held accountable for unrealistic objectives.

Teachers felt that parents and external agencies must understand that IEPs, particularly the statements of goals and objectives, are flexible guidelines for instruction. Teachers predicted that if the IEP document is seen as either a contract guaranteeing pupil progress or an accurate representation of daily instruction, it will limit their responsiveness to the individual and changing needs of the handicapped child. They felt that they would lose the freedom to creatively and effectively respond to the evolving needs of children in the classroom if objectives and teaching methods are strictly specified in the IEP document and subject to change only through cumbersome parental notification and consent procedures.

Effects on Services to Children

Most concerns expressed by teachers and support personnel about PL 94-142 indicate that they intend to approach the IEP process with a positive attitude. They point out that, in many respects, their own state mandate has contributed significantly to educational improvements,

and they expect PL 94-142 to further improve special education programming. This expectation is contingent upon provision of sufficient time to experiment with implementation strategies and resources to finance such things as additional professional and paraprofessional personnel, as well as in-service training. However, many concerns mediate this optimism.

Most local educators reported that they have been individualizing instruction for several years. Many feel that implementation of the IEP component of PL 94-142 will be largely a paper process and question the assumption that it will actually improve education for handicapped children unless increased financial support is provided. Being fully aware that resources in the first years of PL 94-142 implementation, and perhaps even later, will not be sufficient to install IEP procedures and provide necessary service, local school personnel predict that they and the children will bear the "cost" of implementation. In the past the cost to handicapped children has sometimes been diminished and less effective services from educators. A speech therapist said that since the implementation of HB 90, she has had to cut the services she provides children in order to participate in program development activities. A resource room teacher reported that when faced with the pressure to document his work with children, he often has to choose between working with a child and record keeping. Many psychologists and communication disorder specialists predicted that in order to keep up with record keeping and meetings and still provide services for children, they will be tempted to perform less thorough assessments or evaluate children in a cursory manner. In addition, several felt that an unserved population of children with minor handicapping conditions may be created either because school staff will focus their limited service time on children

with the greatest need or because some regular education teachers, who do not want to become involved in the IEP process or who see it as being too slow to respond, may choose not to refer children with minor problems.

Summary and Suggestions

Teachers and support personnel have the most critical roles in the development and provision of the individual educational program for a child with handicapping conditions. Attention to their concerns is important if individualized educational programming is to be successfully implemented.

Many teachers and support personnel are unsure of how precisely their roles will change and what responsibilities will be added to their jobs as a result of implementation. Some suggested that districts work with teaching and support staff to define new roles and responsibilities so that some of the confusion can be eliminated and peoples' energies can then be directed toward effective implementation. In-service training like that initiated by the state earlier this year is needed to familiarize staff with changes resulting from implementation and to teach such skills as performing informal assessments, developing goals and objectives, evaluating pupil progress on a continual basis, and communicating effectively in the group pupil planning meeting. Regular classroom teachers need training at the pre-service and in-service levels to know how to individualize instruction for the handicapped child in the regular class setting and to know about the needs and abilities of children with various handicapping conditions.

Within the instructional setting, teachers suggested that they need to maintain control over determining instructional objectives and to maintain flexibility in order to respond to the changing needs of children. Further, they pointed out that in order for the IEP process to be useful in planning

and carrying out instruction, they must be assured that their performance will not be evaluated by measuring pupil progress either at the local, state, or federal level. Further, they emphasized that implementation must be accompanied by the resolution of some of the problems they feel are critical to effective programming: demands on their limited time and resources to fund more classroom aides, materials, specialized personnel, and services.

The experience of several districts suggests that the development of standard forms at the district level is one way to simplify record keeping. The components of the IEP specified in the law are recorded in one set of forms which the teacher also uses to record pupil progress on a daily or weekly basis. Several support personnel suggested that state and federal reporting requirements be consolidated so that duplicative record keeping is not necessary.

Local educators suggested two alternatives to the fully staffed IEP meeting. Citing the potentially large demand on support personnel to attend meetings to develop long-range goals, several felt that a local administrator or one rather than several support staff members could attend the meeting, preferably the person most familiar with the parent and child. Others suggested that, in some cases, a pre-conference of school personnel to discuss program options would reduce the need for several school staff to attend meetings for each child. Many school personnel indicated the need to have some flexibility in staffing IEP meetings so that other services to children would be minimally affected. Any procedures employed must, of course, not restrict appropriate parent involvement.

Federal/State/Local Relationships

Local and state educators view PL 94-142 as reinforcing initiatives already taken in the state pointing to federal requirements for more comprehensive individual educational program plans and parental involvement in the formulation of the education plan. Although on a conceptual level most people supported the intent of PL 94-142 and its provisions, many expressed concern about the effects of increasing the federal role in both the financing and regulation of special education, and, further, expressed concern about how the law would actually be implemented.

As local districts have responded to their state mandate, they have seen some of their efforts and resources being expended in meeting procedural requirements and have experienced an increased level of accountability to the state for educational programming. Looking ahead to the implementation of PL 94-142's IEP component, many local educators expressed concern that the federal mandate, with what many interpret as strict procedural requirements and its implied accountability, will potentially interfere with local rights and responsibilities.

Reactions to the IEP Requirements of PL 94-142

Monitoring

- Some educators predict that the threat of external monitoring will affect the way the IEP document is written and will thus limit the document's usefulness for individual planning and instruction and administrative decision making.

Standards

- Some local educators are concerned that standards and procedures determined by the state or federal government will be inflexible and limit their right to determine educational programs.

- To some educators, provisions specified in PL 94-142 related to the IEP meeting, its participants and the content of the IEP document are requirements that merely substitute a new pupil planning process for the one which is already functioning adequately.

Fiscal Needs for Implementation

- Concern was expressed that local districts will have ultimate responsibility for implementing the IEP process but that resources resulting from the legislation will not be sufficient to do so.

Monitoring

Concerns related to IEP monitoring and interference with local programming and decision making by external agencies stem in part from a response to a recent state auditing of local special education programs. In addition, local school district personnel expressed concern about external monitoring which does not differentiate between student review and procedural review. A student review includes examination of the specific content of the IEP document and its appropriateness for a particular child. In a procedural review, the IEP process is reviewed and district programming and fiscal operations are audited. It is this latter review which was considered appropriate for state and federal monitoring.

Many teachers and support staff said that if they thought agencies outside the local district would use the IEP document to evaluate the educational programs of individual children or the districts' programming in general, they would write general goals and objectives that are easy for the child to attain. Further, local educators and parents, as well as the Forum Panel, cited the critical role that an intimate understanding of people, practice, and conditions within a district plays in the determination

and review of appropriate educational programs and stressed that the service provider and parents are best able to monitor substantive aspects of a child's program.

Many respondents felt that procedural review should be the shared responsibility of local, state, and federal agencies, to assure that the rights of the child are protected and that the intent of the law is being carried out on at least a minimal level. Local administrators felt strongly that, while procedural monitoring is necessary, it must be carried out with an openness that enables the local district to utilize feedback for improving their programs. Panelists stressed that the auditing function should be separated from the monitoring of a child's program.

Standards

Attitudes toward standardization reflect the concerns of some people that provisions of PL 94-142 specify a rigid pupil planning process incompatible with current practice in local districts. In addition, concern was expressed that external regulation of special education will eventually result in the rigid specification of roles, procedures, and forms, amounting to control over what traditionally have been local prerogatives. Local educators recognize the need and potential efficiency of a basic level of uniformity in planning procedures and reporting. However, they feel strongly that with minimum guidelines local districts should have discretion in determining the roles of school personnel in the pupil planning process, the specific procedures to be employed by the district, and the forms to be used in documenting the process.

Since each local district has a functioning process responsive to state regulations and local conditions, it was felt that only minimal

revisions should be necessary to respond to PL 94-142 so that service to children would not be sacrificed to the fulfillment of procedural requirements. The Forum Panel, citing the variation in local conditions, recommended that the roles of local educational agency personnel in the IEP meeting not be specified but rather be left to the local district to determine. Although all districts have developed forms for the documentation of the pupil planning process and the educational program, most local educators agreed that they need to know what additional reporting requirements will be specified so that they can revise their current forms to be responsive to both state and federal needs for information.

Fiscal Needs for Implementation

Although the cost of special education services is heavily supported by state excess cost funding, local educators already feel that current resources are not sufficient to adequately respond to their state mandate, particularly in the area of specialized services and supportive, paraprofessional, and clerical personnel. They are concerned that the resources initially generated by PL 94-142 will not be sufficient to adequately implement IEP procedures and expressed resentment over being given the ultimate responsibility in the absence of necessary funding. In addition, some local administrators feel that their inability to finance all appropriate services to handicapped children might involve them in costly litigation, not only with parents but also with the state or federal educational agencies, which they feel should not be their responsibility.

Several local administrators said they anticipate that PL 94-142 will be useful to them in fiscal and programmatic planning and as a form of leverage to obtain needed resources from the state. They pointed

out that gathering data from all district IEPs would enable them to accurately document current services and project future program and personnel needs as well as to justify requests for funding. It was also suggested that similar information aggregated by the state educational agency level could be utilized for statewide planning of specialized services, personnel preparation, and cooperative arrangements for the provision of certain services in special education.

Summary and Suggestions

With PL 94-142, the federal government assumes a regulatory role in special education not present previously. Although some local educators view the federal mandates as further strengthening HB 90's provisions for individualized educational programming for handicapped children, still others feel that it gives the federal government and state educational agency some control over decisions related to local programming and resource allocation. In addition, the latter group resents being given what they consider to be new procedures and guidelines they must implement with their current, limited resources.

Respondents to Project IEP made several suggestions which address their concerns. To assure effective review of individual programs, pupil monitoring should be the responsibility of school district personnel and the child's parent because they are responsible for program planning and are cognizant of local considerations which often influence program development. In order for the IEP process to enhance local efforts rather than interfere with current administrative practice, the development of any standards related to procedures and roles should be flexible, permitting variation in accordance with local staffing patterns, parental involvement,

and resources. In response to concerns expressed about increasing pressure on local administrators resulting from implementation, some respondents suggested that the state provide local districts with technical assistance in dealing with complex demands for the allocation of available resources and services and to the changing nature of responsibilities in special education programming.

CONCLUSION

Project IEP attempted to document the diverse perceptions of parents, teachers, support personnel, and administrators concerning the IEP requirements of PL 94-142. The focus and energy of the project was a grassroots sampling of those closest to and responsible for handicapped children and their education. The sampling was not purposive and may be perceived as limited in generalizability; however this limitation should not detract from the salience and value of what was heard and said.

Those interviewed universally endorsed the concept of an individualized education program, but were cognizant of and concerned about contextual factors, which, if not present, may seriously jeopardize the provision of a free, appropriate public education, based upon an IEP, for each handicapped child. The many comments made suggest that the IEP mandate will require increases and shifts in resource allocations, modification in in-service and pre-service training, and commitments of parents, teachers, support personnel, and administrators to share responsibility for improving the quality of education for the handicapped. These comments suggest that successful implementation of the IEP is tied as much

to people and their attitudes as to organizational or administrative realignments. If our attention is given to these issues in responding to the central mandate of PL 94-142, then time, effort, and experience should reflect the intent of the law and benefit each handicapped child.

PROJECT IEP: PANEL RECOMMENDATIONS

Project IEP: Panel Members

Kathleen Barnett
Chairperson
State Governmental Affairs
WARC

Ralph Bohannon
Administrator of Special Services
Lake Washington School District

Art Getchum
Principal
Nisqually Middle School

Maurice Harmon
Director
Bureau of Developmental Disabilities
Department of Social and Health Services

Cecile Harper
Principal
Rainier School

Jack Hill
Superintendent
Wenatcheee School District

Larry McKnight
Superintendent
Washington State Cerebral Palsy Center

Cheryl Peters
Special Education Teacher
North Thurston School District

Larry Stranz
Principal
Mt. View Elementary School

Richard Walker
Psychologist
Educational Service District #113

Paul Wysocki
Manager of Handicapped Services
Department of Human Resources

Panel Recommendations

In considering the purpose and uses of the IEP, the Washington Panel suggested that the purpose of the IEP is to establish a specifically designed educational plan to meet the unique needs of the handicapped child. The IEP can also be used to provide:

- a source of data for research and reporting, e.g., needs assessments, progress reports, uniform statistical reports, and planning and management information;
- program continuity for the child; and
- a tool to foster public awareness of the needs of the handicapped child and to gain parental involvement and commitment.

In considering testimony related to the parent's role in the IEP process, the panel observed that while parents and professionals had expressed the need for parental involvement, they had not suggested how the involvement should be structured. The panel recommended that:

- Beyond an LEA's documented effort to involve the parent in the development of the IEP, no procedures should be required.
- Although parental involvement in the IEP process should not be standardized, LEAs should insure that parents are not intimidated by predeveloped programs. Every effort should be made to involve parents in the development of the IEP.
- There is a need for educators to recognize that their specialized vocabulary may not be functional in communicating with non-educators.
- Educators must recognize that parents may not be at ease in the formal conference setting.
- Institutions have unique problems in parental involvement and will need to rely frequently on surrogate parents for the IEP process. This should not, however, be an excuse for not involving parents whenever and wherever possible and documenting such attempts.

In considering concerns raised by teachers and support personnel, the panel suggested:

- Given present human and other resources, the time and effort required to develop the IEP will initially decrease the quality of education for the child; however, the concept of the IEP process should in the long run increase the quality of education to the handicapped child if time problems can be eliminated and additional new resources provided. We cannot legally require professionals to use their own time to develop or implement programs, nor should we morally expect it.

- Regular education teachers as well as specialists must receive in-service training to be effective.

- Teachers who serve a large number of students, such as speech therapists and some resource room teachers, should not be required to participate in the IEP process in the same way that a special education teacher who serves only a few students is required to participate. If specialists are required to meet with parents and other professionals in developing an IEP for each child they teach, services to children will decrease.

In considering federal, state, and local relationships, particularly related to standardizing aspects of the IEP process and monitoring, the panel stated:

- Additional resources necessary to meet the mandate of the law will be required. These resources must be provided with maximum local discretion in their use.

- Testimony indicated that if we go beyond the minimal standardization of elements of the IEP and conference participants, the child's progress could be adversely affected. Standardization must be minimal so that flexibility is possible. Witnesses substantiated the need for flexibility in order to guarantee that individual needs are met. For example, standardizing the requirements for parent involvement is an area of concern. Witnesses from smaller or remote districts illustrated the problems of getting parents and professionals to attend the IEP conference.

- The regulations should not require <u>specific</u> local education agency representatives to be present at the IEP. Due to scheduling difficulties and travel considerations, the school must have the option of determining IEP participants. This will be of particular importance in small districts.

- "District representative" is not mandated to mean a particular specialty such as psychologist and can be anyone not directly involved in the immediate education of the child.

- Within the states, efforts must be made to better coordinate state and federal reporting requirements.

- The timeline for implementation of the IEP process must be reestablished to include annual review but not necessarily at the beginning of the school year.

- To assure optimum development of a child's program that includes future needs, a protective clause should be provided to prevent litigation against the local educational agency if services are not provided as projected.

- Where monitoring is conducted by an outside agency (i.e., state, federal) to evaluate program effectiveness, it limits the primary purpose of the IEP.

- Monitoring conducted by the direct provider of services to the handicapped child is not seen as limiting.

- The auditing function must be separated from the monitoring of a child's program.